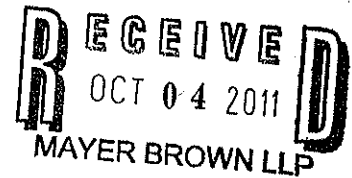


EXHIBIT A



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Interim Lead Counsel for Plaintiffs and the Proposed Class

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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN JOSE DIVISION

IN RE: HIGH-TECH EMPLOYEE
ANTITRUST LITIGATION

Master Docket No. 11-CV-2509-LHK

**PLAINTIFFS' FIRST SET OF REQUESTS
FOR PRODUCTION OF DOCUMENTS**

THIS DOCUMENT RELATES TO:

ALL ACTIONS

Pursuant to Federal Rules of Civil Procedure 26 and 34, Plaintiffs hereby request that Defendants separately respond to the following requests for production of documents ("Requests"), and produce the documents specified herein at a location agreed upon by counsel within thirty (30) days.

I. DEFINITIONS

Throughout these discovery requests, including the Definitions, the words used in the masculine gender include the feminine, and the words used in the singular include the plural. Wherever the word "or" appears herein, the meaning intended is the logical inclusive "or," i.e., "and/or."

The following Definitions apply to these Requests:

1 1. “Agreement” means any oral or written contract, arrangement or understanding,
2 whether formal or informal, between two or more persons, together with all modifications and
3 amendments thereto.

4 2. “All” should be construed to include the collective as well as the singular, and
5 means “each,” “any,” and “every.”

6 3. “Antitrust regulatory authority” means any governmental antitrust regulatory or
7 investigative entity, whether domestic or foreign, including but not limited to the United States
8 Department of Justice, United States Federal Trade Commission, the California Attorney General,
9 or any grand jury investigation.

10 4. “Cold-calling” and “cold-call” means communicating directly in any manner
11 (including, without limitation, orally, in writing, telephonically, or electronically) with another
12 company’s employee who has not otherwise applied for a job.

13 5. “Co-Conspirators” include: Adobe Systems Inc., Apple Inc., Google Inc., Intel
14 Corp., Intuit Inc., Lucasfilm Inc., Pixar, and DOES 1-200 as defined in the Consolidated
15 Amended Complaint.

16 6. “Communication” means oral or written communications of any kind, including
17 without limitation, electronic communications, e-mails, facsimiles, telephone communications,
18 correspondence, exchanges of written or recorded information, or face-to-face meetings.

19 7. “Document” includes, without limitation, the original (or identical duplicate when
20 the original is not available) and all non-identical copies (whether non-identical because of notes
21 made on copies or attached comments, annotations, marks, transmission notation, or highlighting
22 of any kind) and drafts of all writings, whether handwritten, typed, printed or otherwise produced,
23 and includes, without limitation, letters, correspondence, memoranda, legal pleadings, notes,
24 reports, agreements, calendars, diaries, travel or expense records, summaries, records, messages
25 or logs of telephone calls, conversations or interviews, telegrams, instant messages, text messages
26 (SMS or other), mailgrams, facsimile transmissions (including cover sheets and confirmations),
27 electronic mail, minutes or records of meeting, compilations, notebooks, laboratory notebooks,
28 work papers, books, pamphlets, brochures, circulars, manuals, instructions, sales, advertising or

1 promotional literature or materials, ledgers, graphs, charts, blue prints, drawings, sketches,
2 photographs, film and sound reproductions, tape recordings, or any other tangible materials on
3 which there is any recording or writing of any sort. The term also includes the file, folder tabs,
4 and/or containers and labels appended to, or associated with, any physical storage device
5 associated with each original and/or copy of all documents requested herein.

6 8. Electronically Stored Information ("ESI") includes, without limitation, the
7 following:

8 a. activity listings of electronic mail receipts and/or transmittals;
9 b. output resulting from the use of any software program, including without
10 limitation word processing documents, spreadsheets, database files, charts, graphs and outlines,
11 electronic mail, AOL Instant Messenger (or similar program) or bulletin board programs,
12 operating systems, source code, PRF files, PRC files, batch files, ASCII files, and all
13 miscellaneous media on which they reside and regardless of whether such electronic data exist in
14 an active file, deleted file, or file fragment;

15 c. any and all items stored on computer memories, hard disks, floppy disks,
16 CD-ROM, magnetic tape, microfiche, or on any other vehicle for digital data storage and/or
17 transmittal, including without limitation a personal digital assistant, such as an iPhone, Palm
18 Pilot, Blackberry, Treo or other device.

19 9. "Employee" means, without limitation, any current or former officer, director,
20 executive, manager, secretary, staff member, messenger, agent or other person who is or was
21 employed by a Defendant or Co-Conspirator in a salaried, non-retail capacity.

22 10. "Including" is used to illustrate a Request with particular types of documents
23 requested, and should not be construed as limiting the Request in any way.

24 11. "Meeting" means, without limitation, any assembly, encounter, or
25 contemporaneous presence (whether in person or via any electronic computer-assisted, digital,
26 analog, or telephonic method of communication) of two or more persons for any purpose,
27 whether planned, arranged, scheduled or not.

28

12. "Or" should be construed to require the broadest possible response, and should be read as "and/or."

13. "Person" includes without limitation any natural person, corporation, partnership, government entity, and any other form of legal or business entity.

14. "Relating to," "referring to," "regarding," or "with respect to" mean without limitation discussing, describing, reflecting, dealing with, pertaining to, analyzing, evaluating, estimating, constituting, concerning, containing, mentioning, studying, surveying, projecting, assessing, recording, summarizing, criticizing, reporting, commenting or otherwise involving, in whole or in part.

15. "Subsidiary," "affiliate," and "joint venture" refer to any entity or person in which you have any financial or ownership interest.

16. "SWOT" means analyses regarding Strengths, Weaknesses, Opportunities, and Threats.

17. "You," "your," or "your company" means its predecessors, successors, subsidiaries, departments, divisions, affiliates, and/or agents (including, without limitation, any third-party recruiting, hiring, or headhunting firm), together with all present and former directors, officers, employees, agents, representatives, or any persons acting or purporting to act on behalf of you.

II. INSTRUCTIONS

1. You are directed to make available for inspection and copying all of the documents requested herein at the offices of Lieff, Cabraser, Heimann & Bernstein, LLP, 275 Battery Street, 29th Floor, San Francisco, CA 94111-3339, within thirty (30) days after service of these requests.

2. Unless otherwise noted in the body of a request, the relevant time period of these document requests is January 1, 2001 through the present (the "relevant time period" or "relevant period"). These document requests seek all responsive documents created or generated during the relevant time period, as well as responsive documents created or generated outside the relevant time period, but which contain information concerning the relevant time period.

1 3. In producing documents, you are to furnish all documents or things in your
2 possession, custody or control, regardless of whether such documents are possessed directly by
3 you or your employees, agents, parent companies, subsidiaries, affiliates, investigators or by your
4 attorneys or their employees, agents or investigators.

5 4. All documents shall be produced in the same order as they are kept or maintained
6 by you in the ordinary course of your business. All documents, other than electronically stored
7 information, shall be produced in the file folder, envelope or other container in which the
8 documents are kept or maintained. If for any reason the container cannot be produced, you
9 should produce copies of all labels or other identifying marks which may be present on the
10 container.

11 5. If a document was prepared in several copies, or if additional copies were
12 thereafter made, and if any such copies were not identical or are no longer identical by reason of
13 subsequent notation or modification of any kind whatsoever, including, without limitation,
14 handwritten notations on the front or back of the document, all such non-identical copies shall be
15 produced.

16 6. Documents shall be produced in such fashion as to identify the department, branch
17 or office in whose possession they were located and, where applicable, the natural person in
18 whose possession they were found and the business address of each document's custodian(s).

19 7. If a document once existed and subsequently has been lost, destroyed or is
20 otherwise missing, you should provide sufficient information to identify the document and state,
21 in writing, the details, including whether the document:

- 22 a. is lost or missing;
- 23 b. has been destroyed and, if so, by whom and at whose request;
- 24 c. has been transferred or delivered, voluntarily or involuntarily, to another
25 person or entity and at whose request; or
- 26 d. has been otherwise disposed of.
- 27
- 28

1 8. In each instance in which a document once existed and subsequently is lost,
 2 missing, destroyed, or otherwise disposed of, explain the circumstances surrounding the
 3 disposition of the document, including, but not limited to:

- 4 a. the identity of the person or entity who last possessed the document;
- 5 b. the date or approximate date of the document's disposition; and
- 6 c. the identity of all persons who have or had knowledge of the document's
- 7 contents.

8 9. If any document responsive to any of these requests is privileged, and the
 9 document or any portion of the document requested is withheld based on a claim of privilege,
 10 provide a statement of the claim of privilege and all facts relied upon in support of that claim,
 11 including the following information:

- 12 a. the reason for withholding the document;
- 13 b. the date of such communication;
- 14 c. the medium of such communication;
- 15 d. the general subject matter of such communication (such description shall
- 16 not be considered a waiver of your claimed privilege);
- 17 e. the identity of any document that was the subject of such communication
- 18 and the present location of any such document;
- 19 f. the identity of the persons involved in such communication;
- 20 g. the identity of any document which records, refers, or relates to such
- 21 communication and present location of any such document; and
- 22 h. the number or numbers of these requests for production of documents to
- 23 which such information is responsive.

24 10. Documents attached to one another should not be separated. Each document
 25 requested should be produced in its entirety and without deletion, redaction or excisions, except
 26 as qualified by Instruction 8 above, regardless of whether you consider the entire document or
 27 only part of it to be relevant or responsive to these document requests. If you have redacted any
 28 portion of a document, stamp the word "REDACTED" beside the redacted information on each

1 page of the document which you have redacted. Any redactions to documents produced should
2 be identified in accordance with Instruction 9 above.

3 11. All documents produced in paper form should be numbered sequentially, with a
4 unique number on each page, and with a prefix identifying the party producing the document.

5 12. All documents produced in electronic form should comply with plaintiffs' ESI
6 Production Specification, attached hereto as Exhibit A.

7 **III. DOCUMENT REQUESTS**

8 1. All documents, including correspondence, that were provided to, seized by, or
9 received from, any antitrust regulatory authority in connection with *United States v. Adobe*
10 *Systems, Inc., et al.*, Case No. 10-cv-01629-RBW (D.D.C.) and/or *United States v. Lucasfilm*
11 *LTD., et al.*, Case No. 10-cv-02220-RBW (D.D.C.).

12 2. All documents, including correspondence, that were provided to, seized by, or
13 received from, any antitrust regulatory authority in connection with cold-calling or any other
14 recruiting practice, or any communications or agreements relating to your recruiting practices.

15 3. All documents, including correspondence, that were provided to, seized by, or
16 received from, any antitrust regulatory authority in connection with how you determine the
17 compensation of your employees, or any communications or agreements relating to how you
18 determine the compensation of your employees.

19 4. All documents, including correspondence, that were provided to, seized by, or
20 received from, any antitrust regulatory authority in connection with how you determine the terms
21 of an offer you made, might have made, or might make to any potential employee regarding
22 potential employment with you, or any communications or agreements relating to how you
23 determine the terms of an offer you made, might have made, or might make to any potential
24 employee regarding potential employment with you.

25 5. All documents, including correspondence, that were provided to, seized by, or
26 received from, any antitrust regulatory authority in connection with how you determine the terms
27 of an offer you made, might have made, or might make to any employee to retain that employee,
28

1 or any communications or agreements relating to how you determine the terms of an offer you
2 made, might have made, or might make to any employee to retain that employee.

3 6. All documents, including all civil investigative demands, subpoenas, requests for
4 documents, drafts of stipulated final judgments, or other proposed filings, attorney notes, and
5 summaries of witness interviews and proffers (whether or not provided to any antitrust regulatory
6 authority), and any other communications that you have received from or sent to any antitrust
7 regulatory authority, regarding the topics described in Requests 1 through 5, above, including all
8 correspondence with any antitrust regulatory authority discussing, reflecting, or referring to any
9 limitations placed upon the scope of your responses to such demands, subpoenas, or requests.

10 7. All position papers and prepared remarks (including any drafts of such papers or
11 remarks) given, submitted or presented or intended to be given to any antitrust regulatory
12 authority, and all transcripts of testimony given to any antitrust regulatory authority in connection
13 with or in response to any investigation regarding the topics described in Requests 1 through 5,
14 above, and all transcripts of proceedings relating to any investigation by any antitrust regulatory
15 authority regarding the topics described in Requests 1 through 5, above.

16 8. All indices and lists that catalogue or describe the documents responsive to
17 Requests 1 through 5, above, including privilege logs.

18 9. All documents regarding any understanding, agreement, commitment, contract, or
19 proposal between or among you and any Co-Conspirator relating to:

- 20 a. cold-calling or any other employee recruiting method;
21 b. notification to a Co-Conspirator upon making an offer of employment to a
22 Co-Conspirator's employee;
23 c. restrictions on the manner, timing, or content of the terms of an
24 employment offer, or counteroffer, you made, or could have made, to potential or current
25 employees;
26 d. limiting competition for labor in any way;
27 e. restricting employee compensation in any way; or
28

1 f. enforcement, monitoring, or implementation of any of the above
2 understandings, agreements, commitments, contracts, or proposals.

3 10. For each of your employees who attended any meetings, or who had any
4 communications, with any employee of any Co-Conspirator relating to any topic described in
5 Request 9, above, produce:

6 a. the personal and company copy of all diaries, calendars, pocket calendars,
7 personal digital assistants, appointment books, and appointment notes, both electronic and non-
8 electronic;

9 b. the personal and company copy of all trip and travel logs, records, and
10 supporting documents;

11 c. the personal and company copy of all telephone number logs, directories,
12 notebooks, card files (such as Rolodex cards or any electronic functional equivalent) and
13 memoranda;

14 d. all telephone bills, statements, records and supporting documents; and

15 e. personnel files you created or maintained.

16 11. All agendas, minutes, notes, or memoranda of any meeting of the Board of
17 Directors or any committee thereof relating to any topic described in Request 9.

18 12. All communications between Steven P. Jobs and Edward T. Colligan regarding
19 any topic described in Request 9, and any documents regarding same.

20 13. All documents relating to the termination, retirement, discipline, demotion,
21 discharge, suspension, severance, or change in position of any director, officer or employee with
22 responsibility or input in recruiting, hiring, or retaining of salaried employees, including without
23 limitation the terms of any cooperation, indemnification, or severance agreement between you (or
24 any direct and indirect subsidiary) and each such employee.

25 14. All business plans, analyses, reports, studies, memoranda, budgets, forecasts, slide
26 presentations, strategic plans, SWOT analyses, or costs or profit projections referring or relating,
27 in whole or in part, to identifying potential employees, recruiting, hiring, or retaining employees.
28

1 15. All documents that analyze, evaluate, or summarize market conditions regarding
2 employees, including without limitation, documents regarding competition, market shares,
3 competitive position, employee turnover, compensation levels, and hiring capacity.

4 16. All documents that refer or relate to the compensation, hiring, or recruiting of
5 employees by any company other than you.

6 17. All documents comparing types or levels of employees with each other, or
7 showing the interchangeability or similarity of salaried employees across different types, levels,
8 or employers.

9 18. All documents concerning any analysis, summary, or description of factors
10 affecting: employee productivity, employee morale and/or satisfaction, turnover, employee loss,
11 whether an employee accepts an offer from a rival employer, or whether a potential employee
12 accepts an employment offer.

13 19. All documents concerning any analysis, summary, or description of rival
14 employers' recruiting, retention, or compensation practices.

15 20. All documents concerning any method, formula, policy, practice, or calculation
16 you, or any Co-Conspirator, used for determining compensation of employees.

17 21. All agendas, minutes, notes, or memoranda of any meeting of the Board of
18 Directors or any committee thereof relating to how you determine your employees'
19 compensation.

20 22. Documents sufficient to show your participation in, or control of, subsidiaries,
21 affiliates, or joint ventures engaged in the hiring, recruiting, or retention of your employees.

22 23. Documents sufficient to identify, for all individuals you employed during the Class
23 Period as defined in the Consolidated Amended Complaint, for each year, or fraction thereof:

- 24 a. the total number of such employees;
25 b. the location(s) at which each employee worked;
26 c. the total compensation of each employee by form of compensation,
27 including, without limitation, salary, bonuses, and stock options; and
28 d. the title(s) and responsibilities of each employee.

1 24. All documents regarding the total amount you spent to compensate your
2 employees (including all forms of compensation, such as stock options), for each quarter of the
3 Relevant Period.

4 25. All documents, data, or analyses regarding information you obtained in connection
5 with employee recruiting, hiring, or exit-interviewing, including, without limitation:

6 a. Your employees' previous employers (or educational institution, where
7 applicable); and

8 b. if the employee left to work for another employer, the identity of that
9 employer, and the reasons why the employee accepted an offer to work with that employer.

10 26. All documents comparing the effectiveness of different recruiting techniques.

11 27. All documents concerning the effects of rival employers' recruiting techniques on
12 your employees' willingness to continue employment with you.

13 28. All documents concerning how your employees negotiate pay increases.

14 29. All documents regarding the factors you consider in deciding whether to increase
15 employee pay.

16 30. All documents concerning your employees' knowledge, or access to,
17 compensation practices of rival employers, including, without limitation: the effect of such
18 knowledge or access on your employees' ability to increase their compensation, and the effect of
19 such knowledge or access on your ability to retain your employees.

20 31. All documents regarding how you categorize your employees, including, without
21 limitation, by: type, title, skill, job family, seniority, department, or compensation level.

22 32. All documents concerning your monitoring, analysis, or description of your
23 employees' compensation, including, without limitation:

24 a. compensation relationships among employees within the same employment
25 category (e.g., among junior software engineers);

26 b. compensation relationships among employees across different employment
27 categories (e.g., among junior software engineers relative to senior software engineers);
28

1 c. compensation relationships among employees across different employers
2 (e.g., junior software engineers you employ relative to junior software engineers another Co-
3 Conspirator employees); and

4 d. compensation relationships among employees across different locations
5 (e.g., junior software engineers at one of your office locations relative to junior software
6 engineers at another of your office locations).

7 33. All documents concerning your employees' perceptions of compensation
8 relationships, both internal and external.

9 34. All documents regarding how you determine, update, monitor, or set baseline
10 compensation levels (as opposed to negotiated compensation levels).

11 35. All documents regarding employee salary ranges for particular categories of
12 employees.

13 36. All documents regarding the relationship between baseline compensation and
14 negotiated compensation.

15 37. All documents comparing potential employees who are actively looking for a
16 different employer versus potential employees who are not actively looking for a different
17 employer.

18 38. All documents regarding the costs to you of losing an employee to a rival
19 employer.

20 39. All documents regarding the costs to a rival employer of you recruiting and/or
21 hiring an employee from that rival.

22 40. All documents regarding competition between or among you and any Co-
23 Conspirator(s) for employees.

24 41. Documents sufficient to identify all third parties you have used for:

- 25 a. identifying potential employees to recruit;
26 b. recruiting employees;
27 c. compensating employees;
28 d. hiring employees;

1 e. surveying salaries and other terms of employment, for your own employees
2 or employees of others (e.g., Radford surveys);

3 f. job evaluation studies; and

4 g. otherwise analyzing any topic responsive to any of these document
5 requests.

6 42. All documents regarding communications and/or meetings with any of the third
7 parties described in document request 41, including contracts.

8 43. Documents sufficient to identify all individuals responsible for retaining or
9 managing the third parties described in document request 41.

10 44. All documents you provided to, or received from, any of the third parties described
11 in document request 41 regarding any of the topics described in document request 41.

12 45. All documents showing your organizational structure regarding all individuals
13 involved in the hiring, recruiting, retaining, and compensating of your employees, including,
14 without limitation, organization charts, telephone or email directories, personnel bios, and
15 individual job descriptions.

16 46. Organization charts sufficient to identify:

17 a. individuals who act as custodians of business records and other information
18 for you, such as all persons responsible for ESI management, organization, retention,
19 preservation, and destruction of ESI;

20 b. all of your internal information services or information technology
21 departments; and

22 c. all individuals who are responsible for creating back-ups for archiving
23 email messages.

24 47. Documents that reflect or describe your policies, procedures, and guidelines for
25 your company's use or retention of email, instant messages, or other forms of electronic
26 communications.

1 48. Documents that reflect or describe your document retention policies and any
2 litigation hold implemented in connection with this litigation, including the date that any
3 litigation hold was implemented.

4 49. All documents referring to the concealment, destruction or spoliation of any
5 documents that are responsive to any of these document requests.

6 50. All documents relating to your corporate policies or practices regarding
7 compliance with United States or California antitrust laws.

8 51. Documents sufficient to show how to operate or run any of the programs
9 maintained on the computer-related equipment or system utilized by you to maintain data
10 responsive to any of these requests, including whether any such data can be produced within an
11 Excel spreadsheet.

12 52. Documents sufficient to explain the meaning of the data responsive to any of these
13 requests, including all record layouts, data dictionaries, field codes, and other codes or
14 descriptions.

15 53. All documents provided to, transmitted to, received from, or concerning the named
16 Plaintiffs in this action.

17 54. All documents you intend to use or rely upon at trial.

18 Dated: October 3, 2011

LIEFF CABRASER HEIMANN & BERNSTEIN, LLP

19
20 By: 

Joseph R. Saveri

21 Joseph R. Saveri (State Bar No. 130064)
22 Eric B. Fastiff (State Bar No. 182260)
23 Brendan P. Glackin (State Bar No. 199643)
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EXHIBIT A

ESI PRODUCTION SPECIFICATION**1) General Specifications**

- a) Produce all documents in native format with corresponding Tiff files (and extracted text and metadata), unless otherwise specified below.
- b) Metadata will include fields described below and contain a complete list of common data fields.
- c) Image cross reference files will function with Opticon viewer.
- d) Media volume names will have the producing party's internal tracking ID.
- e) Provide extracted text, as applicable (.txt) and OCR for documents where no extracted text exists.

2) Output Files

- a) Extracted Text / OCR Index Files: Control List (.lst)
- b) Image Index Files: Opticon (.opt)
- c) Metadata Files: Concordance (.dat)

3) Output Folder Structure

- a) Producing party will manually create the top level directory prior to production.
- b) Tiff and text files for a single document will always be in the same folder.

Directory Structure	Standard with Padding
<VFID-Media#>.dat,<VFID-Media#>.lfp	___XXX01-01.dat, XXX01-01.lfp
<VFID-Media#>	XXX01-01
Folder# (01)	01
BatesNumber.tif	EXAMPLE00000001.tif
BatesNumber.tif	EXAMPLE00000001.txt
BatesNumber.tif	EXAMPLE00000002.tif
Folder# (02)	02
BatesNumber.tif	EXAMPLE00000501.tif
BatesNumber.tif	EXAMPLE00000501.txt
BatesNumber.tif	EXAMPLE00000502.tif

4) General Configuration

- a) Documents will not be broken across multiple Tiff or Media folders.
- b) For sets 3.5 GB or smaller, provide on DVD.
- c) For sets larger than 3.5 GB, provide on Hard Drive.
- d) Produce Tiff files in single page format at 300 DPI.

5) Text Files

- a) Produce full text on a per-document basis.
- b) Name Text Files according to the corresponding first Tiff (BegDoc#) of the document.
- c) Do not truncate.

6) Native Files

- a) Produce Excel files in native format, accompanied by Tiff placeholder including Bates number (range), file name, media description, and confidentiality denotation.
 - i) If native format of an Excel file is not available, produce Tiff version with the following specifications:
 - (1) Unhide columns, rows and sheets (if possible; please denote)
 - (2) Expand groupings/outlines
 - (3) Print each sheet across (left to right), then down
 - (4) Landscape print orientation
 - (5) Remove blank pages as possible
- b) Produce PowerPoint files in native format, accompanied by Tiff placeholder including Bates number (range), file name, media description, and confidentiality denotation.
 - i) If native format of a PowerPoint file is not available, produce Tiff version with the following specifications:
 - (1) Unhide all elements, remove protections
 - (2) Covert color to black-and-white and utilize MS PowerPoint print feature

- (3) Turn off background so all text is visible
 - (4) If slide contains speaker note, slides will be presented in “notes view”
 - (5) If slide contains no speaker note, print slides to Tiff image format in slide show view, one slide per page.
- c) Produce Database and CSV files in native format, accompanied by Tiff placeholder including Bates number (range), file name, media description, and confidentiality denotation.
- i) Each Access database data set will be accompanied by database schema (using MS Access Database Documentor feature to include all tables, queries, reports, macros with full features).
 - ii) Produce the original .MDB file for each Access database.
 - iii) Provide Data Library.
 - iv) Produce data schema for ALL databases (applicable for all RDBMS systems).
 - v) May use load file for comma delimited contents of CSV or data queries or analysis tools.
- d) Produce Media Files in native format, accompanied by Tiff placeholder including Bates number (range), file name, media description, and confidentiality denotation.
- i) Production will include a chart setting forth the certain metadata and MD5 hash signature of each native media file.
 - ii) Define metadata with the following data elements identified under Concordance Metadata load file (.dat) section below, where applicable.
- 7) Family Range Configuration
- a) Stand alone files will be Top-Level PST and have a blank Parent ID.
 - b) The following file types will have the following format entry types:
 - i) Stand alone files: either “File” or “Email,” as applicable.
 - ii) Attachments to emails: “Email Attachment”
- 8) Family Range Definitions
- a) Top level PST files will not include any “children” documents – consider these files as standalone files.

- b) Standalone files will not have a Family Range or Child List.
- c) All other files and emails will have a Family Range when the file or email has a Parent or Child (Children).
- d) Family range will start with the first page of the top most Parent and go until the last Child's last page.
- e) Documents with no Family Range will have their own document range in the Family Range fields.
- f) Files and Emails whose direct parent is a Top Level PST will not have a Parent Bates.

9) Family Range Values Examples

Description:	Top Level PST File	Top most Email	Attachment to Doc 2	Second Attachment to Doc 2
File Name	Doc No. 1	Doc No. 2	Doc No. 3	Doc No. 4
Prefix	[Blank]	XYZ	XYZ	XYZ
Begin Bates	[Blank]	XYZ1	XYZ2	XYZ16
End Bates	[Blank]	XYZ1	XYZ15	XYZ20
Family Range	[Blank]	XYZ1-XYZ20	XYZ1-XYZ20	XYZ2-XYZ20
Parent Bates	[Blank]	[Blank]	XYZ1	XYZ1
Parent Name	[Blank]	Doc No. 1	Doc No. 2	Doc No. 2
Child List	[Blank]	Doc. No. 2-3	[Blank]	[Blank]

10) Use Concordance Metadata Load Files (.dat)

- a) Load Files will contain one line per document.
- b) Load Files will have the field names as the as first row of data.
- c) Concordance Metadata Load Files will include the following:

Field Name	Description	(Comments)	Field Type
DocID	Beginning unique identification number for document		Limited Text
EndProd	Ending unique identification number for document		Limited Text

Field Name	Description	(Comments)	Field Type
StartBates (BegDoc#)	StartBates Production number		Limited Text
EndBates (EndDoc#)	Endbates Production number	Include prefix and padding	Limited Text
BegAttach	Beginning unique identification number for any attachment or range of attachments	Include prefix and padding	Limited Text
EndAttach	Ending unique identification number for any attachment or range of attachments	Include prefix and padding	Limited Text
AttachRange	Beginning and ending unique identification number for any attachment or range of attachments.		Limited Text
ParentID	Production Parent StartBates	Include prefix and padding	Limited Text
ParentName	Document's parent's FileName or Subject		Full Text
ChildList	Child document list of Filenames and/or Subjects	Include multivalue	Full Text
Source	Custodian or Source of document		Full Text
MediaSource	Document Type		Limited Text
PageCount	Number of Pages		Limited Text
DateSent	Date Email was Sent (MMDDYYYY)		Date
TimeLastModified	Last modified time (HH:MM) of electronic file		Time
DateLastModified	Last modified date (MMDDYYYY) of electronic file.		Date
Sort Date	For Child Files (eg email attachments), document date of parent file		Date

Field Name	Description	(Comments)	Field Type
TimeCreated	Time (HH:MM) Created		Time
DateCreated	Date (MMDDYYYY) Created		Date
DateLastAccessed	Date (MMDDYYYY) File Last Accessed		Date
TimeSent	Time Message Sent		Date
Hash Value	MD5 Hash Value (Specify if SHA-1 used)		Limited Text
FileName	File name of the file (or parent PST for email)	Will be blank for email	Full Text
FileSize	File size (as bytes)		Limited Text
Doc Ext	The document extension of the document	Will be blank if 0	Limited Text
Subject	Subject line of Email	Will be blank for Files	Full Text
From	Sender	Will be blank for Files	Full Text
To	Recipient [Delimited list]	Include multivalued Will be blank for Files	Full Text
Cc	Cc [Delimited list]	Include multivalued Will be blank for Files	Full Text
Bcc	Bcc [Delimited list]	Include multivalued Will be blank for Files	Full Text
Author	Information contained in the author field, if any		Full Text
DocTitle	Information contained in the title field, if any		Full Text
Confidentiality	Confidentiality designation of the document	Include multivalued	Full Text

Field Name	Description	(Comments)	Field Type
SourcePath	Data's source path information; where file was stored on custodian's hard drive or network resource	Will be blank for email	Full Text
EmailFolder	Email folder path (sample: Inbox\active) [Blank for files]		Full Text

11) Metadata Load File Delimiters

- a) If Field Encapsulators or Separators are found in the metadata they will be replaced with another character or space.

Type	Character/Format	Replace with	Notes
Field Encapsulate	Ctrl Character "b" (Decimal 254)	Space " "(Decimal 032)	
Field Separator	Ctrl Character "□" (Decimal 020)	Space " "(Decimal 032)	
Multi-value Delimiter	Semi Colon "; " (Decimal 59 space)	N/A	
New Line Indicator	Registered Symbol "®" (Decimal 174)	N/A	Text line separator, used in TextInfo only.
Dates are stored	MMDDYYYY	N/A	

12) OCR Index Files (.lst)

- a) Follow example above for format and delimiters.
- b) **Bold** is constant, *Italics* are variable, and pay attention to the use of commas and semicolons.
- c) Each file will contain one line per Tiff.
- d) Format: *BatesPage*,\TextPath\TextFileName.txt
- e) Example: ABC00100000,\02501-01\01\ABC00100000.txt
- f) Definition of Components:

BatesPage	BatesPage value from metadata file.
Folder#	The number of the folder containing the Tiff.
TextFileName	Text files will be named with a bates number.txt (Bates Padding/Prefix Configuration Section).
NewDocIndicator	Determine New Document Indicator Values.
	Y – if the Tiff is the first page of any document.
	BLANK – for all other pages.
PageCount	Number of pages in the document.

13) Opticon Image Index File

a) Follow example above for format and delimiters.

i) Format:

BatesPage,VolumeName,TiffPath\TiffFileName.tif,NewDocIndicator,,,PageCount

ii) Example:

xxx00100000,VolName002,yyy01-1\1\xxx00100000.tif,Y,,,4

iii) Definition of Components:

BatesPage	BatesPage value from metadata file.
VolumeName	The volume name of the Media containing the tiffs.
TiffPath	VFID#-Media#\Folder#
VFID#	The number of the Virtual Folder that the Tiff originated from
Media#	The number of the Media containing the Tiff
Folder#	The number of the folder containing the Tiff
TiffFileName	Tiffs will be named with a bates number.tif (Bates Padding/Prefix Configuration Section)
NewDocIndicator	Determine New Document Indicator Values
	Y – if the Tiff is the first page of any document.
	BLANK – for all other pages.
PageCount	Number of pages in the document

